

EAP:eap

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Minnesota

UNITED STATES OF AMERICA

Case No. 22-mj-357 JFD

v.

RACHELLE ANN RAAB

**FILED UNDER SEAL PURSUANT TO 18
U.S.C. § 3509(d)(2) AND L.R. 39.1(c)(1)(G)****CRIMINAL COMPLAINT**

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

COUNT 1 — Production of Child Pornography

On or about February 11, 2022, in the State and District of Minnesota and elsewhere, defendant Rachelle Ann Raab attempted to and did knowingly employ, use, persuade, induce, entice, and coerce a minor child under the age of 12 years old, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate and foreign commerce, transported in and affecting interstate and foreign commerce, and was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT 2 — Distribution of Child Pornography

On or about February 11, 2022, in the State and District of Minnesota and elsewhere, defendant Rachelle Ann Raab knowingly distributed a visual depiction, to wit, an image file identified as video000000(3).mp4, a video approximately 7 seconds in duration depicting an what appears to be an adult hand rubbing the exposed penis of a prepubescent child; using a means or facility of interstate commerce by any means including by computer, and the production of such visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction is of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

I further state that I am a Special Agent and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No


Complainant's signature

SUBSCRIBED and SWORN before me
by reliable electronic means via Zoom pursuant to Fed. R.
Crim. P. 41(d)(3).

Matthew Vogel, Special Agent

Printed name and title

Date:

April 27, 2022



Judge's Signature

City and State: St. Paul, MN

John F. Docherty
United States Magistrate Judge

Printed Name and Title